

Society for Animal Protective Legislation

PO Box 3719, Washington, DC 20027

telephone: (703) 836-4300

email: sapl@saplonline.org

facsimile: (703) 836-0400

May 20, 2005

The National Organic Standards Board
c/o Arthur Neal
Room 4008 - South Building
1400 and Independence Avenue, SW
Washington, DC 20250-0001

Submitted Via Email to: NOSB.Livestock@usda.gov

Dear National Organic Standards Board,

The Society for Animal Protective Legislation (SAPL), the legislative division of the Animal Welfare Institute (AWI), respectfully submits the following comments on the National Organic Standards Board (NOSB) "Livestock Committee Recommendation for Guidance Pasture Requirements". SAPL's practical and humane recommendations seek to ensure the integrity of the requirement that ruminants have access to pasture.

Organic System Plan Requirements

In order to perform behaviors essential to physiological and psychological health and well-being, each animal must have access to pasture throughout his or her lifetime, in season, and be allowed to graze and ruminate whenever the animal's physiological condition, the weather conditions and the state of the ground are suitable. Through all stages of an animal's life access to suitable pasture and a significant and consistent roughage component must be provided in the diet to ensure and maintain proper rumen function. The minimum requirement should be 70% long fiber roughage on a dry matter basis.

Breeds adapted to the pasture environment and to a farm's specific climate should be used. In most cases, ruminants that have been properly selected for the specific climate conditions will voluntarily choose to go outdoors in all but the most extreme weather.

Temporary Confinement

Assuming "pasture" means edible, nutritious, growing vegetation appropriate to the species, SAPL strongly encourages that temporary confinement be allowed only in the following situations:

1) During a period of a few days of inclement weather in the grazing season when the health, well-being or survival of the animals is immediately threatened, specifically: a) severe rainstorms including freezing rain or hail; b) tornadoes or high wind storms carrying soil or debris; c) hurricanes; d) severe heat or humidity which necessitates bringing animals to temporary confinement to be tended.

2) Conditions under which the health, safety, or well being of an individual animal or other members of the flock or herd would be jeopardized if the animal were not temporarily removed from pasture, specifically to a) restore the health of an individual animal or b) to prevent the spread of disease from an infected animal to other animals.

3) To allow the soil or water being utilized by the animals to be relieved of usage for a few days in order to preserve their quality.

We have defined "inclement", above, because people may interpret the term in various ways. There should be more specificity in the standards to prevent someone from bringing animals into confinement during an entire spring season when mild spring rains are common. SAPL suggests "inclement weather" refer specifically to severe rainstorms, to tornadoes and hurricanes or unrelenting heat and burning sun. Rainstorms and tornadoes usually pass through an area within a matter of hours, but there are rare occasions when an area can be hit by one tornado after another for a few days and hurricanes can last for a few days. Heat waves can last for days or weeks, but giving animals shade or sprinklers or access to water in which to submerge themselves should be provided in addition to pasture in those cases, as opposed to confinement away from pasture. Furthermore, please consider that some ruminant species or breeds may be more affected by certain weather conditions than others. As mentioned previously, SAPL urges NOSB to advocate use of breeds that are adapted to the pasture environment and a farm's specific climate.

Last of all, specific exemptions should be spelled out, and use of "such as" or "for example" should be omitted from the standards as it encourages people to attempt to justify inappropriate confinement.

Appropriate Pasture Conditions

All farms shall have a formal pasture management plan in place that addresses the specific farm site to ensure that:

- (a) The nutritional requirements of the animals can be adequately met through grazing and appropriate supplementation.
- (b) The composition of the pastures does not inadvertently create health problems for grazing animals.

- (c) Pastures are not degraded by overgrazing and other management techniques. Management practices to ensure appropriate paddock size, grazing frequency, and the location of water, shelter, and feeding bunkers, should be addressed in the plan.
- (d) Animals are grazing fresh, clean pasture that has not become polluted with manure.
- (e) Non point pollution and other local environmental standards are being met.

Pastures containing high levels of clover and other legumes shall be avoided as they can cause bloat in grazing animals.

SAPL commends the Board on making recommendations, but strongly encourages the NOSB to strengthen the pasture requirement by incorporating the above suggestions. Thank you for your consideration of these comments, and please contact SAPL if clarification or additional information is sought.

Respectfully,

Wendy Swann
Legislative Assistant

